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REMARKS/DISCUSSION OF ISSUES

By this Amendment, Applicant cancels claims 17-18 without disclaimer of the underlying subject matter or prejudice against future prosecution. Applicant also adds new claim 19, and amends claims 1-16 to eliminate reference numerals and to replace European-style claim phraseology with American-style claim language. The claims are not narrowed in scope and no new matter is added.

Reexamination and reconsideration are respectfully requested in view of the following Remarks.

35 U.S.C. § 103

The Office Action rejects claims 1-16 under 35 U.S.C. § 103 over Baudisch U.S. Patent Publication 2002/0167531 ("Baudisch") in view of Witehira U.S. Patent 6,906,762 ("Witehira").

Applicant respectfully traverses those rejections for at least the following reasons.

Claim 1

Among other things, the display apparatus of claim 1 includes: (1) means for extracting background content information from the visual content signal; (2) means for generating a surround image in response to the extracted background content information; and (3) means for displaying the surround image on a secondary display area thereby providing a combined display having an increased viewing angle.

Applicant respectfully submits that no combination of the cited art would ever produce a display apparatus including this combination of features.

Baudisch discloses a display (e.g., FIG. 15) which has a **greater image resolution** (increased pixel density) in a first display area (e.g., 140) than it has in a second display area (e.g., 130).

The Office Action states that Baudisch discloses means for extracting content information from a visual content signal, and means for generating an image in response to the content information, citing elements 280 and 255, respectively.

Applicant respectfully disagrees.

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Element 280 in <u>Baudisch</u> is an image fork. Image fork 280 replicates the image and provides the multiple images to separate viewers 260 which scale and crop the image to provide the appropriate data for viewing a corresponding portion of the total image on a corresponding display 290. Image processor 255 receives data from a corresponding view and processes the data so that it can drive the corresponding display 290. Image fork 280 does not extract any **content information** from the image, and image processor 255 does not generate an image from any extracted content information.

Furthermore, the Office Action fairly admits that <u>Baudisch</u> does not disclose generating any surround image from a visual content signal from any background content information extracted from the visual content signal.

The Office Action states that <u>Witehira</u> discloses extracting a background image.

However, the Office Action does not state that <u>Witehira</u> discloses generating a **surround image** in response to extracted background content information. Applicant respectfully submits that <u>Witehira</u> does not disclose generating a surround image in response to extracted background content information, and Applicant also respectfully submits that that no combination of <u>Baudisch</u> and <u>Witehira</u> would ever produce a display including such a feature.

<u>Witehira</u> is directed to providing a display with improved capability to display image **depth**. Toward this end, <u>Witehira</u> discloses a multi-layer display which processes a video signal 21 to produce a **foreground** image 20 for a foreground screen 3 and a background image 19 for a **background** screen.

<u>Witehira</u> is <u>not</u> concerned with providing a display with a wider **viewing angle**. Therefore, it is not surprising that <u>Witehira</u> does not disclose generating any **surround** image – and particularly does not disclose or suggest generating a **surround image** in response to any extracted background content information.

So no combination of <u>Baudisch</u> and <u>Witehira</u> would ever produce an apparatus that includes means for generating a surround image in response to extracted background content information.

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Applicant also respectfully traverses the proposed combination of <u>Baudisch</u> and <u>Witehira</u>.

A rejection on obviousness grounds under 35 U.S.C. § 103 cannot be sustained by mere conclusory statements: instead there must be some articulated reasoning <u>with some rational underpinning</u> to support the legal conclusion of obviousness. See M.P.E.P. § 2142 (quoting <u>In re Kahn</u>, 441 F.3d 977, 988, 78 USPQ2d 1329, 1336 (Fed. Cir. 2006) and <u>KSR</u> 82 USPQ2d at 1396 (2007) (quoting Federal Circuit statement with approval)).

Here, the rejection is supported only by conclusory statements. The Office Action fails to articulate reasons with rational underpinnings for the proposed modifications. In particular, the Office Action fails to explain how or why the proposed combination of <u>Baudisch</u> and <u>Witehira</u> would "*display depth in a display and wide angel* (sic) *viewing without restrictions*," or why this would have been recognized by one of skill in the art at the time the invention was made.

Accordingly, for at least these reasons, Applicant respectfully submits that claim 1 is patentable over the cited art.

<u>Claims 2-15</u>

Claims 2-15 all depend from claim 1 and are deemed patentable for at least the reasons set forth above with respect to claim 1, and for various other novel features recited therein.

For example, with respect to claim 3, the Office Action cites col. 17, lines 29-30 of <u>Baudisch</u> as supposedly disclosing that an image is projected on an internal surface of a room. Applicant disagrees, noting further that col. 17, lines 29-30 <u>Baudisch</u> corresponds to the left hand column of page 9 of <u>Baudisch</u>, and lines 29-30 of that column do not mention any surface of any room. With respect to claim 5, Applicant respectfully submits that nothing in "*col. 5, line 55- col. 5, line 9* (sic)" of <u>Witehira</u> discloses extracting background content information in response to any meta-data in a visual content signal. Furthermore, with respect to claim 11, the cited text at col. 3, lines 26-38 of <u>Witehira</u> does not disclose anything about a surround image, or using a predetermined default image to generate a surround image. These

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are just some examples - Applicant submits that numerous other features of claims 2-15 are not disclosed or suggested by any combination of the cited art.

Applicant also traverses all of the proposed combinations of references in claims 2-15 as the Office Action fails to articulate any rationales of the various proposed combinations.

Claim 16

Among other things, the method of claim 16 includes extracting background content information from the visual content signal, and generating a surround image in response to the background content information.

For similar reasons to those set forth above with respect to claim 1, Applicant respectfully submits that no combination of Baudisch and Witehira would produce any method including this combination of features.

Accordingly, for at least these reasons, Applicant respectfully submits that claim 16 is patentable over the cited art.

NEW CLAIM 19

Among other things, the system of claim 19 includes an extraction processor for extracting background content information from a visual content signal; and a second display processor for generating a surround image in response to the extracted background content information, wherein a combination of the image and the surround image provide a greater viewing angle than the image alone.

Applicant respectfully submits that no combination of Baudisch and Witehira would produce any method including this combination of features.

Accordingly, for at least these reasons, Applicant respectfully submits that claim 19 is patentable over the cited art.

CONCLUSION

In view of the foregoing explanations, Applicant respectfully request that the Examiner reconsider and reexamine the present application, allow claims 1-16 and 19 and pass the application to issue. In the event that there are any outstanding

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matters remaining in the present application, the Examiner is invited to contact

Kenneth D. Springer (Reg. No. 39,843) at (571) 283.0720 to discuss these matters.

Respectfully submitted,

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